

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF IOWA  
CEDAR RAPIDS DIVISION

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STATE OF KANSAS, STATE OF SOUTH CAROLINA, STATE OF IOWA, STATE OF ALABAMA, STATE OF ALASKA, STATE OF ARKANSAS, STATE FLORIDA, STATE OF GEORGIA, STATE OF IDAHO, STATE OF INDIANA, COMMONWEALTH OF KENTUCKY, STATE OF MISSOURI, STATE OF MONTANA, STATE OF NEBRASKA, STATE OF OKLAHOMA, STATE OF NORTH DAKOTA, STATE OF SOUTH DAKOTA, STATE OF UTAH, COMMONWEALTH OF VIRGINIA, STATE OF WEST VIRGINIA, LEADINGAGE KANSAS, LEADINGAGE SOUTH CAROLINA, LEADINGAGE IOWA, LEADINGAGE COLORADO, LEADINGAGE MARYLAND, LEADINGAGE MICHIGAN, LEADINGAGE MINNESOTA, LEADINGAGE MISSOURI, LEADINGAGE NEBRASKA, LEADINGAGE NEW JERSEY/DELAWARE, LEADINGAGE OHIO, LEADINGAGE OKLAHOMA, LEADINGAGE PA, SOUTH DAKOTA ASSOCIATION OF HEALTHCARE ORGANIZATIONS, LEADINGAGE SOUTHEAST, LEADINGAGE TENNESSEE, LEADINGAGE VIRGINIA, DOOLEY CENTER, WESLEY TOWERS,

*Plaintiffs,*

v.

XAVIER BECERRA, in his official capacity as Secretary of the United States Department of Health and Human Services; UNITED STATES DEPARTMENT OF HEALTH AND HUMAN SERVICES; CENTERS FOR MEDICARE & MEDICAID SERVICES; and CHIQUITA BROOKS-LASURE, in her official capacity of Administrator of the Centers for Medicare and Medicaid Services,

*Defendants.*

Civil Action No. 1:24-cv-00110

**PLAINTIFF'S MOTION FOR  
PRELIMINARY INJUNCTION AND  
ORAL ARGUMENT**

**PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION AND ORAL ARGUMENT**

Plaintiffs hereby move this Court for a preliminary injunction of Defendants' Final Rule, entitled "Medicare and Medicaid Programs; Minimum Staffing Standards for Long-Term Care Facilities and Medicaid Institutional Payment Transparency Reporting." See 89 Fed. Reg. 40876 (May 10, 2024). In support of their motion, Plaintiffs attach a memorandum explaining the grounds for this motion (Exhibit 1), and supporting Exhibits 2-28.

With respect to the attached brief, Plaintiffs have also filed a motion to exceed page limits (ECF 29). The attached brief in support is also attached to that motion.

Plaintiffs request oral argument for this motion.

Respectfully Submitted,

KRIS W. KOBACH  
Attorney General of Kansas

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**CERTIFICATE OF SERVICE**

This is to certify that on this 22nd day of October, 2024, I electronically filed the above and foregoing document with the Clerk of the Court using the CM/ECF system, which will send a notice of electronic filing to all counsel of record.

Since no counsel of record has made an appearance for Defendants, service will occur pursuant to the Federal Rules of Civil Procedure.

/s/ Abhishek S. Kambli  
Abhishek S. Kambli  
*Counsel for Plaintiff State of Kansas*